

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,)	
)	
Plaintiff,)	
)	
v.)	Misc. No. 17-151-LPS
)	
BOLIVARIAN REPUBLIC OF)	
VENEZUELA,)	
)	
Defendant.)	

**NOTICE OF FILING OF
TOPPING PERIOD BID MATERIALS RECEIVED BY SPECIAL MASTER**

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Dated: July 2, 2025
12341371 / 21202.00001

PLEASE TAKE NOTICE THAT the Special Master¹ hereby files the topping bid proposal letters and proposed SPAs (where applicable)² (the “**Bid Materials**”) submitted by the four (4) bidders not recommended as the Recommended Bidder by the Special Master (the “**Bid Materials**”).³ The Special Master separately filed the final bid letter and other bid materials submitted by the Recommended Bidder as exhibits to the *Special Master’s Final Recommendation* (D.I. 1837, Ex. B, Ex. E–H). The Bid Materials submitted by: (i) Red Tree Investments, LLC (“**Red Tree**”) in connection with its Revised Stalking Horse Bid are attached hereto as **Exhibit A**; (ii) Bidder A are attached hereto as **Exhibit B**; (iii) Bidder B are attached hereto as **Exhibit C**; and (iv) Black Lion are attached hereto as **Exhibit D**. The Bid Materials attached hereto contain minimal redactions intended to preserve the confidentiality of Bidder A and Bidder B’s identity and any other sensitive information.⁴ See *Memorandum Order Regarding Sale Process and Litigation* dated December 31, 2024 (D.I. 1517) ¶ 23.

¹ All capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the *Sixth Revised Proposed Order (A) Establishing Sale and Bidding Procedures, (B) Approving Special Master’s Report and Recommendation Regarding Proposed Sale Procedures Order, (C) Affirming Retention of Evercore as Investment Banker by Special Master and (D) Regarding Related Matters* (D.I. 481) (the “**Sale Procedures Order**”) and in the *Special Master’s Final Recommendation* (D.I. 1837) (the “**Final Recommendation**”).

² Black Lion Capital Advisors, LLC (“**Black Lion**”) did not submit a proposed SPA together with its topping bid proposal letter.

³ The Bid Materials attached hereto do not include the financing commitment letters submitted by the applicable bidders, if any.

⁴ The identity of Red Tree is public in connection with its Stalking Horse Bid and the identity of Black Lion is public as its bid letter was docketed by the Court on June 23, 2025. See D.I. 1822.

Respectfully submitted,

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